

U.S. Department
of Transportation

United States
Coast Guard



Commandant
United States Coast Guard

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COMDTNOTE 6260

27 FEB 1996

COMMANDANT NOTICE 6260

CANCELLED: 27 FEB 1997

Subj: CH-1 TO ASBESTOS EXPOSURE CONTROL MANUAL, COMDTINST
M6260.16A

1. PURPOSE. This notice publishes revisions to COMDTINST M6260.16A. Intended users are all Coast Guard units that have asbestos containing materials (ACM) within its facility and have trained asbestos abatement personnel.
2. ACTION. Area and district commanders; commanders, maintenance and logistics commands; commanding officers of headquarters units; and chiefs of offices and special staff divisions at Headquarters shall ensure compliance with the provisions of this notice.
3. SUMMARY OF CHANGES. Newly revised material is denoted by a vertical line in the outside margin. The following changes are summarized below:
 - a. COMDTINST M6260.16A, 5-D-2 - second sentence deleted.
 - b. Paragraph 3-B-1, 3-B-3, and 3-D-3 describes new policy requiring personnel who meet Federal and state asbestos accreditation requirements.
 - c. Paragraph 4-B-1 - rewritten for clarity.
 - d. Paragraph 4-D-1 - rewritten for clarity.

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- e. Paragraph 4-E-1 - rewritten for clarity.
- f. Paragraph 4-E-2 references enclosure (6) which contains additional guidance to assist personnel when conducting emergency repairs of asbestos onboard vessels.
- g. Paragraph 4-E-4 requires MLC (k) to provide training in emergency shipboard asbestos removal.
- h. New enclosure (6) added which provides specific procedures for the emergency repair and removal of asbestos on cutters.

4. PROCEDURES.

- a. Pen and ink change paragraph 5-D-2, delete second sentence beginning with "Identification testing may also.....".
- b. Remove and insert the following pages:

REMOVE

Table of Contents
Chapter 3, Page 3-1 to 3-2

Chapter 4

INSERT

Table of Contents, CH-1
Chapter 3, Page 3-1 to
3-2, CH-1
Chapter 4, CH-1
New Enclosure (6), CH-1



ALAN M. STEINMAN
Chief, Office of Health and Safety

Encl: (1) CH-1 to COMDTINST M6260.16A

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Enclosures:

- (1) Generic Procedure for Collection of a Bulk Specimen for Asbestos Analysis
- (2) Asbestos Warning Labels and Signs: Specifications and Commercial Vendors
- (3) Inspection Checklist for Asbestos-Containing Material
- (4) Environmental Protection Agency (EPA) Notification, Reporting, Monitoring, and Record Keeping for ACM Repair, Removal, and Disposal Operations
- (5) Work Practices for Removing Asbestos Brake Shoes
- (6) Emergency Repair of Asbestos on Board Vessels

CHAPTER 3. IDENTIFICATION OF ASBESTOS

A. Introduction.

1. Identification of asbestos in the workplace is the first step in controlling asbestos exposure. This chapter discusses how to identify asbestos. If ACM is identified at a unit, the command must institute an Asbestos Management Plan as discussed in Chapter 2.
2. Coast Guard personnel may encounter ACM in three categories: in a product which contains asbestos, in equipment or building structures which contain ACM, or in the execution of various Coast Guard operations in which personnel may encounter ACM in workplaces not owned or operated by the Coast Guard.

B. Identification Procedure.

1. Commanding officers and group commanders are responsible for identifying potential or suspected asbestos hazards and contacting MLC (k) for support. MLC (k) is responsible for asbestos hazard evaluation including the collection and laboratory analysis of material for asbestos content using personnel who meet Federal [reference (b)] and state asbestos accreditation requirements. When assistance from MLC (k) is not feasible, commands may contract for service. Contractors must also meet Federal [reference (b)] and state asbestos accreditation requirements. Contact MLC (kse) for details.
2. ACM identification is not easy or straightforward since asbestos cannot be distinguished by odor or color and since it is typically mixed with other materials prior to its use. The presence and percentage of asbestos in a material can be determined only by laboratory analysis unless documentation is available to verify the contents of the material.
3. Safety and occupational health personnel at the Coast Guard Yard and personnel at Coast Guard Base Ketchikan who meet Federal [reference (b)] and state asbestos accreditation requirements are authorized to perform the analysis and identification of asbestos.

C. Products Containing Asbestos.

1. The use of products which contain asbestos is prohibited except where a satisfactory substitute does not exist. The use of asbestos products for which a satisfactory substitute does not exist shall have prior approval of Commandant (G-KSE).

2. Personnel can determine if a product contains ACM by reviewing the Material Safety Data Sheet (MSDS) for the product. In accordance with COMDTINST 6260.21(series), Hazard Communication for Workplace Materials, each unit shall obtain an MSDS for each hazardous material in use at the unit. Specific procedures and safe work practices for handling these products will be provided on the MSDS for the item.

D. Equipment and/or Structures Containing Asbestos.

1. Asbestos has excellent properties for thermal and electrical insulation. As a result, it has been used extensively in a variety of construction materials. ACM may be found in equipment, buildings, and/or cutters in which it may serve many purposes such as:
 - a. Surfacing material: ACM sprayed or troweled onto surfaces to provide fireproofing or sound dampening;
 - b. Thermal insulation: ACM applied as insulation in the form of pipe lagging, pipe wrap, batt, and cements for pipes, boilers, and tanks to reduce heat transfer; and
 - c. Miscellaneous insulating materials: this includes floor tiles, ceiling tile, or outdoor siding and roofing which contain asbestos.
2. Insulation material which meets the description in 3.D.1 or other material suspected of containing asbestos shall be tested prior to removal or repair. If laboratory analysis shows that the material is ACM, MLC (k) shall determine the appropriate removal or repair procedures. If the material is not tested, it must be assumed to be ACM and the removal or repair procedures required for ACM shall be used. There are two exceptions to this policy: underway casualty repair work onboard cutters shall follow the procedures in Chapter 4; and material which has documentation to verify that it does not contain asbestos.
3. Prior to the decommissioning of a cutter, in accordance with reference (k), an asbestos survey onboard the cutter shall be completed by MLC (kse) personnel who meet Federal [reference (b)] and state asbestos accreditation requirements.

CHAPTER 4. REPAIR, REMOVAL, AND DISPOSAL OF ASBESTOS-CONTAINING MATERIAL

A. Introduction. This chapter provides basic guidance to unit personnel on the repair, removal, and disposal of ACM.

B. MLC (k) Authorization for Repair, Removal, and Disposal Operations.

1. Coast Guard military and civilian personnel are prohibited from removing, repairing, or disposing ACM unless authorized by MLC (k) and trained in accordance with Federal, state, or local laws.
2. Commanding Officer, U. S. Coast Guard Base Ketchikan and Commanding Officer, U. S. Coast Guard Yard are authorized to designate personnel to remove, repair, and dispose of ACM in accordance with Federal and state regulations. Each of these two commands shall provide the cognizant MLC (k) with documentation of the following annually: applicable training; state and local certifications; work practices; respiratory protection program in accordance with reference (d); and other personal protective equipment use. The cognizant MLC (k) shall annually review the documentation described above and witness the work practices for at least one asbestos removal job.
3. For cutters underway, removal of ACM is only authorized under the conditions described in 4.E, below. For non-emergency conditions when the cutter is dockside, the cognizant MLC (v) shall contract or coordinate for the services necessary to remove or repair the ACM.
4. Prior to the commencement of major asbestos abatement projects in Coast Guard owned housing units, the command, with the assistance of MLC (k), shall ensure that an asbestos hazard awareness briefing is presented to Coast Guard members and their dependents residing in the housing units and to the Coast Guard personnel assigned to maintain the housing units. As a minimum, the briefing shall provide information on the hazards of asbestos and the hazard control methods to be used during the abatement project.

C. Reporting and Record Keeping for Repair, Removal, and Disposal of ACM.

1. Prior to the repair, removal, and disposal of ACM, references (i) and (j) require that the Environmental Protection Agency or, if applicable, the cognizant state agency be notified with information on the operation.

2. For ACM repair, removal, and disposal operations, the cognizant contracting official shall be responsible for the reporting requirements in references (i) and (j). Enclosure (4) provides guidance on meeting the requirements of references (i) and (j). Records shall be retained for each ACM repair, removal, and disposal operation by the contracting command as well as by the command where the ACM abatement operation occurred.
3. For ACM operations at Coast Guard Yard and Base Ketchikan, reporting and record keeping requirements in references (i) and (j) shall be completed by each command with copies of reports submitted to MLC (k) for review.

D. Repair of ACM.

1. Coast Guard military and civilian personnel are prohibited from repairing ACM unless authorized by MLC (k). The cognizant Civil Engineering Unit or Naval Engineering Support Unit shall coordinate or contract for services to perform ACM repair work and shall comply with the requirements in references (b), (c), (d), (f), and (i) as well as applicable state and local requirements.
2. MLC (k) may authorize Coast Guard personnel to perform minor ACM repair such as patching small punctures in ACM pipe lagging. In many states, ACM repair may only be done by individuals licensed by the state. MLC (k) shall advise unit personnel as to the applicability of Federal, state, and local laws and regulations; safe work practices; training; personal protective equipment; and other equipment necessary to perform the ACM repair.

E. Removal of ACM.

1. Coast Guard military and civilian personnel are prohibited from removing ACM unless authorized by MLC (k). The cognizant MLC (v) or MLC (s) office shall coordinate or contract for the services necessary to remove and dispose of ACM and shall ensure that contractors and/or other personnel used in the removal of ACM fully comply with the requirements in references (b), (c), (d), (f), (g), (h), (i), and (j) as well as all applicable state and local laws and requirements.
2. For cutters, removal or rip-out of asbestos insulation and other asbestos containing materials shall not be done by ship's force personnel, except during underway casualty repair work which has the approval of the vessel's commanding officer or personnel delegated this authority by the commanding officer such as Damage Control Central [see Enclosure (6)].

3. The cognizant Naval Engineering Support Unit shall assist cutters in the disposal of ACM from underway casualty control work.
4. MLC (k) shall provide asbestos repair training to afloat units during routine MLC (k) safety and environmental health audits, assistance visits, or inspections.
5. MLC (k) may authorize Coast Guard personnel to perform only minor ACM removal work. Reference (i) requires EPA notification and safe work practices for friable and certain non-friable ACM removal jobs. In many states, state certified training and licensure is required for anyone removing ACM. MLC (k) may authorize unit personnel to perform the following minor ACM removal jobs: removal of asbestos brake shoes in accordance with enclosure (5) and small-scale removal of non-friable ACM material as defined in reference (i). MLC (k) shall advise unit personnel as to the applicability of Federal, state, and local laws and regulations; work practices; personal protective equipment and other equipment necessary to perform the removal and disposal of ACM. For removal of asbestos brake shoes, a command may substitute an alternate procedure to the one required in enclosure (5) based upon a hazard evaluation and written authorization from MLC (k).

F. ACM Waste Shipment and Disposal.

1. The ACM waste generated from repair and/or removal operations must be disposed of in accordance with the requirements in references (i) and (j).
2. For asbestos-containing waste generated on Coast Guard facilities and disposed of off-site, the command which contracted for or coordinated the ACM operation shall ensure that:
 - a. The disposal facility is being operated in accordance with reference (i); and
 - b. That the record keeping requirements of references (i) and (j) are completed. The contracting command and the command generating the ACM waste shall retain copies of the disposal record keeping information.
3. Disposal of asbestos-containing waste in a Coast Guard owned and operated disposal facility is not encouraged, however, for those disposal facilities in operation the command shall ensure that:

- a. The generator's records required by references (i) and (j) are maintained; and
- b. That the owner/operator records required by references (h) and (j) are maintained.

G. Emergency Response for ACM Release.

- 1. Emergency response to an ACM release not generated from repair, removal, or disposal operations shall be in accordance with guidance from MLC (k).
- 2. After an ACM release, it is critical that ACM not be "carried" into other spaces by pedestrian traffic or through the ventilation system. Prior to contacting MLC (k) for assistance, attempt to determine how much ACM has been released, how far it has spread in the area, and if the release may contaminate the ventilation system in the space. MLC (k) shall provide guidance on equipment and entry procedures.

EMERGENCY REPAIR OF ASBESTOS ONBOARD VESSELS

- A. Introduction. Removal or rip-out of asbestos insulation or asbestos-containing materials shall only be accomplished by vessel personnel during underway casualty work, which has the approval of the commanding officer and follows the safety requirements in NSTM 635. Asbestos control procedures, setting forth these engineering and work practice controls, shall be prepared and available for review.
1. Underway, asbestos removal shall be limited to small-scale, short-duration repair or maintenance activities. Small-scale, short-duration activities are such tasks as:
 - a. Minor repairs of asbestos-containing insulation on pipes. The definition of a minor repair includes removal and reinstallation of less than one linear foot of pipe insulation or less than one square foot of insulation on surfaces other than pipe (an amount which can be done within a glove bag).
 - b. Replacement of an asbestos-containing gasket.
 - c. Installation or removal of electrical cables through or near asbestos-containing materials.
 - d. Limited deck tile removal.
 - e. Corrective maintenance of brake assemblies.
 - f. Removal of insulation due to fire.
 - g. Removal of insulation on exhaust pipes in order to facilitate repair of the engine.
 - h. Removal of insulation on boilers and steam systems in order to make minor repairs.
 2. Each ship that has known asbestos thermal insulation on board is required to have a three-person team trained in the proper use of protective equipment and the specific handling procedures for emergency or operational readiness at-sea repairs necessitating the removal of asbestos lagging. Each repair team shall be composed of a cutter, a cleaner, and a supervisor. The cutter shall moisten, cut, and remove insulation. The cleaner is to minimize the spread of dust, shall use a high efficiency particulate air (HEPA) vacuum continuously in the vicinity of the repair and shall share the responsibility of moistening all cut surfaces.

3. Equipment needed to protect ship's force personnel during shipboard removal of thermal asbestos insulation material is included in the ship's Allowance Equipage List.
4. Removal of asbestos clutch pads on medium endurance cutters is authorized under the following conditions: non-asbestos clutch pads shall be used to replace asbestos clutch pads; and dust hazards will be minimized during the replacement by using wet methods during removal and by avoiding dust generating activities (i.e., compressed air shall not be used to clean the clutch housing).

B. General Workplace Control Practices.

1. Asbestos-free substitute materials shall be used in place of asbestos-containing materials. The replacement or substitution of friable asbestos-containing materials, such as shipboard asbestos thermal insulation, shall be of primary concern because they are loosely bound and may be easily crumbled or pulverized.
2. Insofar as practicable, asbestos shall be handled, removed, cut, scored, or otherwise worked in a wet state sufficient to prevent the emission of airborne fibers.
3. Personnel involved in asbestos-related work activities shall not eat, drink, smoke, chew tobacco or gum, or apply cosmetics in the work area.
4. The procedures in NSTM 635 shall be followed to minimize the accumulation of asbestos laden waste dust and scrap materials. Specific procedures for the containment of asbestos dust and handling of asbestos-containing materials shall be instituted so that the possibility of secondary air contamination is minimized. Clean-up procedures based on wetting the material and use of HEPA filtered vacuum cleaning, for removal of debris, shall be employed.
5. Asbestos waste, scrap, debris, bags, containers, equipment, and asbestos-contaminated clothing (consigned for disposal) shall be collected and disposed of in sealed impermeable bags, or other impermeable containers labeled in accordance with NSTM 635. Containers shall be distinctively color-coded red to ensure easy recognition as asbestos waste. Asbestos waste shall be double bagged and disposed of following the procedures required in NSTM 635.

C. Workplace Release Criteria.

1. Strict adherence to good housekeeping procedures, and dust control measures to minimize release of asbestos fibers during removal/rip-out of asbestos-containing materials are the most important and effective means of

reducing downtime to reoccupy a workspace after asbestos abatement operations. A very critical visual inspection after clean-up is equally important. No asbestos controlled area shall be released for unrestricted access (nor air sampling conducted) until the area has first been thoroughly cleaned and inspected.

2. For emergency or operational readiness repairs at sea, the engineering officer shall conduct a thorough inspection of the asbestos removal area to ensure that the work area has been thoroughly cleaned and is free of all visible asbestos dust.
- D. Ventilation. Local exhaust ventilation is frequently required to ensure that atmospheric levels of asbestos do not exceed permissible exposure limits.
- E. Personal Protective Clothing and Related Facilities. Personnel engaged in handling asbestos-containing materials during at-sea repair operations or in situations where the concentration of airborne fibers, shall wear the provided protective clothing listed below.
1. Full-body, one-piece disposable coveralls (preferably constructed of Tyvek material or comparable substitute). Use of a Tyvek coverall with attached hood is highly desirable.
 2. Hoods (head covering) shall extend beyond the collar of the coverall, completely protecting the neck area. The hood shall be constructed of Tyvek material or comparable substitute. Use of a Tyvek coverall with attached hood is highly desirable.
 3. Medium weight rubber gloves and a thin cotton "under glove" to absorb perspiration shall be used.
 4. Slip resistant plastic shoe covers, or heavy polyethylene shoe covers with slip-resistant soles, or lightweight rubber boots shall be used.
 5. Safety glasses, vented goggles or other appropriate protective equipment shall be used whenever the possibility of eye irritation exists.

NOTE 1: The servicing MLC (kse) shall be consulted upon return to port to review the procedures followed and verify that no further action is required.

NOTE 2: The proper use of protective clothing requires that all openings be closed and that garments fit snugly about the neck, wrists, and ankles. Accordingly, the wrist and ankle

functions, as well as the collar opening on the outer disposable coveralls shall be taped, as necessary, to prevent contamination of skin and underclothing without restricting physical movement.

- F. Respiratory Protection. When accomplishing an at-sea asbestos repair and if the airborne asbestos concentration is unknown, a full-facepiece, continuous flow supplied air respirator shall be used. The ambient air breathing apparatus (AABA) meets this requirement. An oxygen breathing apparatus (OBA) may be used if an AABA is not available. Personnel outside the asbestos removal area, not directly performing work but in the space due to watchstanding requirements, shall, at a minimum, wear a half-mask air purifying respirator equipped with a high efficiency filter.
- G. Warning Signs and Labels.

1. Warning signs shall be provided by the command and displayed at each location where asbestos fibers may be found. Signs shall be posted at sufficient distance from the work area that personnel may read the signs and take the necessary steps before entering the area. A listing of required protective equipment may be attached to or be a part of the sign. The warning sign shall state:

DANGER
ASBESTOS
CANCER AND LUNG DISEASE HAZARD
AUTHORIZED PERSONNEL ONLY
RESPIRATORS AND PROTECTIVE CLOTHING
ARE REQUIRED IN THIS AREA

This warning sign is available from standard stock and is assigned NSN 9905-01-345-4519.

2. Warning labels shall be affixed to containers of raw materials, mixtures, scrap, waste, debris, and other products containing asbestos fibers if, in any foreseeable way, levels of airborne asbestos could be produced which might constitute a threat to health. The warning labels shall be printed in letters of sufficient size and contrast as to be readily visible include the following information:

DANGER
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
CANCER AND LUNG DISEASE HAZARD

H. Disposal Procedures.

1. For guidance concerning specific health-related precautions to be used for specific operations, consult your servicing MLC (kse).
2. In preparation for disposal, asbestos wastes must be adequately wetted, when appropriate, prior to double bagging in heavy-duty (6 mil. thickness) plastic bags or other suitable impermeable containers. All bags or containers must be provided with standard asbestos warning labels. Asbestos waste containers such as bags shall be distinctively color-coded red to assure easy recognition. Care must be exercised in order to prevent bags and other containers from rupturing when being transported to the Naval Engineering Support Unit (NESU) activity for disposal.

I. Training.

1. All personnel currently exposed or with the potential of being exposed to asbestos (emergency repair team) and their division officer and work center supervisors shall receive the following training prior to or at the time of their initial assignment and annually thereafter:
 - a. The health effects/hazards of asbestos.
 - b. Association between the use of smoking tobacco products and asbestos exposure in producing lung cancer.
 - c. Uses of asbestos which could result in an exposure.
 - d. Engineering controls and work practices associated with an individual's work assignment.
 - e. Purpose, proper use and limitations of protective equipment.
 - f. Purpose and description of medical surveillance program.
 - g. Description of emergency and clean-up procedures.
 - h. Overall review of this chapter and the command's/activity's program.
2. Copies of handout type training materials shall be available to personnel upon request.
3. Shipboard emergency asbestos removal teams shall be trained by MLC (kse).

4. Training records shall identify the individual, date of training, and signature of trainer and be retained for a period of no less than five years.
5. All hands who work in areas where asbestos insulation is present should be trained to recognize and report damaged asbestos material.

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